Exhibit B

Exhibit B

'086 Patent, claim 18

Claim Element	Allegations in the Complaint	Alleged Actors in the Complaint
18. An apparatus, comprising:	Paragraph 67 of the Complaint 67. The Accused Instrumentalities comprise an apparatus comprising a memory device, a processing device, and a transmitter. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services ("AWS") data centers located across the United States. Further on information and belief, Grubhub[1] employs multiple redundant data centers to withstand localized outages. *See* above. 68. On information and belief, the infringing Grubhub apparatus comprises Apache Cassandra as a primary data store. See above. 69. Upon information and belief, the Grubhub Accused Instrumentalities comprises data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are in Illinois, Texas, and Utah. See above.	Grubhub
a memory device, wherein the memory	Paragraphs 70-71 of the Complaint	Grubhub

---

[1] Grubhub does not capitalize the "H" in its name. When quoting Plaintiff's allegations in these charts and the accompanying Motion to Dismiss, Defendant has corrected that spelling error.

device stores information regarding an individual available for at least one of applying for and interviewing for at least one of a job, a job opportunity, and a hiring need,	70. The Grubhub Accused Instrumentalities comprise a memory device, which stores information regarding at individuals available for applying for a job opportunity or hiring need. On information and belief, the Grubhub memory device stores information concerning drivers who are available and willing to accept assignments within the Grubhub network. Each such driver, on information and belief, is employed by Grubhub as an Independent Contractor and is retained by users of the Grubhub apparatus to perform specific, defined tasks for the benefit of the user. *See* above. 71. The Grubhub Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Block Scheduling" selections on the Grubhub Driver App or, in the alternative, by virtue of the driver notifying Grubhub of his/her availability for engagement on an open assignment. Available Blocks are open on a first-come, first-served basis for drivers, although certain drivers with higher ranking will receive priority. Drivers who have formally signed up for a given block of time are given assignment priority for deliveries during the timeframe over otherwise available drivers. *See* above.	Driver (Grubhub driver application)
and further wherein the memory device stores information regarding a recruitment search request or inquiry		None
a processing device, wherein the processing device processes the information regarding a recruitment search request or inquiry upon a detection of an occurrence of a searching event,	<u>Paragraph 72 of the Complaint</u> 72. The Grubhub Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Grubhub apparatus completes an Order and Request for Delivery. Each such Order and Request for Delivery comprises a job posting for Grubhub drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. *See* above.	Grubhub

wherein the searching event is an occurrence of at least one of a job posting by at least one employer or at least one hiring entity, a posting of new or revised data or information from at least one individual or a group of individuals, a news release of a business event, an employment-related event, an economic report, industry-specific news, an event which creates an interest by at least one employer or at least one hiring entity to fill a position, and an event which creates an interest by at least one individual to seek a position,	<u>Paragraph 72 of the Complaint</u> 72. The Grubhub Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Grubhub apparatus completes an Order and Request for Delivery. Each such Order and Request for Delivery comprises a job posting for Grubhub drivers, and otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. *See* above.	Grubhub
wherein the processing device automatically detects the occurrence of the searching event,	<u>Paragraph 72 of the Complaint</u> 72. The Grubhub Accused Instrumentalities comprise a processing device which automatically detects searching events, which occur when a user of the Grubhub apparatus completes an Order and Request for Delivery. Each such Order and Request for Delivery comprises a job posting for Grubhub drivers, and	Grubhub

	otherwise comprises an event which creates an interest in an individual (the driver) to seek and accept the position. *See* above.	
wherein the processing device utilizes the information regarding an individual stored in the memory device in processing the information regarding a recruitment search request or inquiry,		None
and further wherein the processing device generates a message containing information regarding the individual,	Paragraph 73 of the Complaint: 73. The Grubhub Accused Instrumentalities comprise a processing device which generates a message containing information regarding the individual (including but not limited to, availability, proximity, acceptance, identity, photo, estimated time of arrival, and location (via Track Your Grub)). The message is transmitted to the user (employer or hiring entity) via the Grubhub Mobile Application or via the Grubhub website. *See* above and below:	Grubhub

	  GrubHub Track your grub PRESS *See* https://www.theverge.com/2012/11/13/3639988/grubhub-track-your-grub-food-delivery-trackingnotifications; *see also* Grubhub Customers Tracking Drivers In Real Time, available at: https://www.youtube.com/watch?v=pCHZIpzKSCk&t=353s	
wherein the message is responsive to the recruitment search request or inquiry; and		None
a transmitter,	Paragraph 67 of the Complaint 67. The Accused Instrumentalities comprise an apparatus comprising a memory device, a processing device, and a transmitter. The infringing apparatus	Grubhub

	comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including individuals, independent contractors, temporary workers, and/or freelancers) in the United States. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services ("AWS") data centers located across the United States. Further on information and belief, Grubhub employs multiple redundant data centers to withstand localized outages. *See* above.	
wherein the transmitter transmits the message to a communication device associated with an employer or hiring entity.	<u>Paragraph 73 of the Complaint</u> 73. The Grubhub Accused Instrumentalities comprise a processing device which generates a message containing information regarding the individual (including but not limited to, availability, proximity, acceptance, identity, photo, estimated time of arrival, and location (via Track Your Grub)). The message is transmitted to the user (employer or hiring entity) via the Grubhub Mobile Application or via the Grubhub website. *See* above and below:	Grubhub

GrubHub Track your grub PRESS

See https://www.theverge.com/2012/11/13/3639988/grubhub-track-your-grub-food-delivery-trackingnotifications;
see also Grubhub Customers Tracking Drivers In Real Time, available at:
https://www.youtube.com/watch?v=pCHZIpzKSCk&t=353s